

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20479-CR-MORENO/GOODMAN

UNITED STATES OF AMERICA

v.

DAN Q. LIN a/k/a “Wendy,”

JIU FA CHEN a/k/a “AL-Min,” and

AIFA SEAFOOD INC.,

Defendants.

/

**DEFENDANT CHEN’S UNOPPOSED MOTION TO
AMEND PRETRIAL RELEASE TO PERMIT TRAVEL**

TO: Thomas A. Watts-FitzGerald
Assistant U.S. Attorney
U.S. Attorney’s Office – Southern District of Florida
99 N.E. 4th Street – Suite 400
Miami, Florida 33132

PLEASE TAKE NOTICE that on a date and time set by the Court, the undersigned counsel for Defendant, Jui Fa Chen, shall move before the Honorable Federico A. Moreno, United States District Court Judge for the Southern District of Florida, Willie D. Ferguson, Jr. United States Courthouse, 400 N. Miami Avenue, Miami, Florida 33128, or other location designated by the Court, for an Order Amending Pretrial Release to Permit Travel.

Defendant Chen requests the Court grant this unopposed amendment to his pretrial release conditions to permit the following travel:

On March 11, 2023, Defendants Chen and Lin will fly commercial airlines from

Miami, Florida, to New York City, New York. They will stay at Defendant Chen's mother's home at 4111 158th Street, Flushing, New York.

On March 12, 2023 Defendants Chen and Lin will drive to Boston, Massachusetts to attend a seafood show. They will return to Defendant Chen's mother's home at 4111 158th Street, Flushing, New York the same night. Defendants Chen and Lin will remain at Defendant Chen's mother's home until March 16, 2023.

On March 16, 2023, Defendants Chen and Lin will take a commercial flight back to Miami, Florida and return to their home.

On March 18, 2023, Defendants Chen and Lin, together with their two minor children, will drive from Miami to Disney World in Orlando, Florida, where they will stay at the Disney World Hyatt until March 20, 2023.

On March 20, 2023, Defendants Chen and Lin, together with their two minor children, will drive from Orlando to Defendant Chen's mother's home at 4111 158th Street, Flushing, New York.

Defendants Chen and Lin, together with their two minor children, will remain at Defendant Chen's mother's house in Flushing, New York until March 25, 2023 when they will drive back to their home in Miami, Florida, where they expect to arrive by March 26, 2023.

All other conditions of Defendant Chen's pretrial release will remain in full force and effect.

A memorandum of law is not required.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant

has conferred with all parties who may have been affected by the relief sought in the motion in a good faith effort to resolve the issues raised herein. As a result the Government does not oppose this motion.

Dated: March 9, 2023

Respectfully submitted,

/s/ Jerome A. Ballarotto

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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record and individuals identified on the Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic Filing.

/s/ Jerome A. Ballarotto

Jerome A. Ballarotto, Esquire

SERVICE LIST

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